

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ROADSYNC, INC.,

Plaintiff,

v.

RELAY PAYMENTS, INC., SPENCER
BARKOFF, and JAMES RYAN DROEGE,

Defendants.

Case No. 1:21-CV-03420-MLB

**DEFENDANTS' MOTION TO STRIKE
PORTIONS OF ROADSYNC'S TRADE SECRET
IDENTIFICATION**

Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Local Rule 37.1, and the Court's inherent authority, and the Court's order following the August 29, 2023 hearing (Dkt. 179), Defendants Relay Payments, Inc. ("Relay"), Spencer Barkoff, and James Ryan Droege (collectively, "Defendants"), respectfully move the Court for an order striking the following portions of RoadSync's trade secret identification: (i) all mentions of "features" and "functions," (ii) all mentions of "compilation" trade secrets, and (iii) Trade Secret category No. 8, "Other."

In support of this motion, Defendants rely on their memorandum of points and authorities and the exhibits submitted herewith, as well as the Declaration of Defendants' Expert Michael Fenn.

DATED: September 12, 2023

/s/ Ryan Landes

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Inc., Spencer Barkoff, and James Ryan
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CERTIFICATE OF SERVICE

I hereby certify that on this day, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of the filing to all counsel of record.

Dated: September 12, 2023

/s/ Ryan Landes

Ryan Landes (admitted *pro hac vice*)